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Attorney for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TAKENOBU MATSUGISHI, an individual;
HITOMI MATSUGISHI, an individual,

Plaintiffs,

vs.

PETER CHEN, an individual; JAMES YUH-
TYNG CHEN, as an individual and as the
trustee of BV TRUST; Hb5 HOLDINGS, LLC,
a Delaware limited liability company; and
BELL VENTURES, INC., a Nevada
corporation, inclusive,

Defendant.

Case No. 2:24-cv-01840-JAD-MDC

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEFENDANTS'
TIME TO FILE RESPONSIVE
PLEADING TO AMENDED COMPLAINT**

(First Request)

Plaintiffs Takenobu Matsugishi, an individual, and Hitomi Matsugishi, an individual (“Plaintiffs”) and Defendants Peter Chen, an individual, James Yuh-Tyng Chen, as an individual and as the trustee of BV Trust, Hb5 Holdings, LLC, a Delaware limited liability company, and Bell Ventures, Inc., a Nevada corporation, (collectively “Defendants”), by and through their undersigned counsel of record, hereby stipulate to a one (1) week extension of Defendants’ deadline to file a responsive pleading to Plaintiffs’ Amended Complaint [ECF No. 13] from its current deadline of **December 13, 2024** to and including **December 20, 2024** to accommodate counsel’s schedules over the holidays.

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The foregoing request is made in good faith and not for purposes of delay.

Dated this 3rd day of December, 2024.

Dated this 3rd day of December, 2024.

LEWIS ROCA ROTHGERBER
CHRISTIE LLP

PARSONS BEHLE & LATIMER

By: /s/ John E. Bragonje
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Attorneys for Plaintiffs

Attorney for Defendants

IT IS SO ORDERED



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

DATED: 12/6/2024